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October 11, 2005

Mr. A.J Adams, Esq.  
602 West 9TH Street  
Erie, PA 16502

RE: TANIELLE SHURNEY v SCOTT'S ECONO INN, INC. et al  
Docket No.: CA05-196  
File No.: 502429900-001

Dear Mr. Adams:

I am enclosing an authorization for this office to secure plaintiffs credit account information. As plaintiff claims she had no credit card at the time of this incident, plaintiff's credit count history and particularly the issuance of credit accounts, is both relevant and discoverable. Accordingly please have the plaintiff sign and return the enclosed authorization. We will provide you with copies of any information secured through use of this authorization.

Very truly yours,

Gerald J. Hutton  
GJH/bms  
With enclosure

CC Gary Bax, Esquire

#### EXHIBIT "D"

## Authorization to Release Credit Information

### To whom it May Concern:

I, Tanielle Shurney, authorize you to provide to Bashline & Hutton, and Litigation Solutions Inc. or any investigator or paralegal retained by Bashline & Hutton, or LSI, Inc., any and all information and documentation regarding my credit history that they request. Such information includes, but is not limited to, credit history and copies of credit card account information and banking and checking account records.

2. A copy of this authorization may be accepted as an original.
3. Your prompt reply to Bashline & Hutton, or the investigator that presents this authorization is appreciated.
4. This authorization is issued in accordance with the Right to Financial Privacy Act of 1978, and this authorization for access to financial records, is in compliance with the applicable provisions of said Act.

\_\_\_\_\_  
TANIELLE SHURNEY

\_\_\_\_\_  
(Social Security Number)

\_\_\_\_\_  
(Date)